## STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF MCF COMMUNICATIONS

DOCKET NO. 358

bg, INC. AND CELLCO PARTNERSHIP D/B/A

VERIZON WIRELESS FOR A CERTIFICATE

OF ENVIRONMENTAL COMPATIBILITY

AND PUBLIC NEED FOR THE

CONSTRUCTION, MAINTENANCE AND

OPERATION OF A WIRELESS

TELECOMMUNICATIONS FACILITY IN THE

TOWN OF THOMPSON, CONNECTICUT

JUNE 3, 2008

# PRE-HEARING SUBMISSION OF CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

MCF Communications bg, Inc. ("MCF") and Cellco Partnership d/b/a Verizon Wireless ("Cellco") (collectively the "Applicant") hereby provide the Connecticut Siting Council ("Council") with the following pre-hearing information available at this time regarding the above-referenced Application.

#### A. <u>List of Witnesses</u>

Brad Gannon, MCF Communications bg, Inc.

Sandy M. Carter, Regulatory Manager, Cellco Partnership

David A. Crotty, Radio Frequency Engineer, Cellco Partnership

Rodney A. Bascom, P.E., Clough Harbour & Associates LLP

These witnesses will testify as to all matters covered in the Application and exhibits.

#### B. Exhibits to be offered

MCF and Cellco intend, at this time, to offer the following Exhibits:

- Application for a Certificate of Environmental Compatibility and Public Need filed by MCF and Cellco dated February 22, 2008, including attachments and the following bulk file exhibits:
  - a. Thompson Zoning Regulations and map;
  - b. Thompson Plan of Conservation and Development;
  - c. Thompson Inland Wetlands and Watercourses Regulations; and
  - d. MCF's "Technical Report" dated December 7, 2007, filed with the Town of Thompson.
- Publisher's Certificate submitted to the Council on February 25, 2008, from the Norwich Bulletin.
- Comments from the Thompson Planning and Zoning Commission ("PZC") dated
   April 7, 2008, including PZC minutes from its March 24, 2008 meeting.
- Applicant's Responses to Pre-Hearing Interrogatories from the Council dated May
   20, 2008.
- Applicant's Responses to Pre-Hearing Questions from Intervenor Thompson Hills
   West Condominium Association dated June 3, 2008.

MCF and Cellco reserve the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties or intervenors.

Respectfully submitted,

MCF COMMUNICATIONS bg, INC. and CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

Kenneth C. Baldwin

Robinson & Cole LLP

280 Trumbull Street

Hartford, CT 06103-3597

Its Attorneys

### CERTIFICATE OF SERVICE

I hereby certify that on the 3<sup>rd</sup> day of June, 2008, a copy of the foregoing was mailed, postage prepaid, to:

Richard W. Thunberg, Jr.
Board President
Thompson Hills West Condominium Association
Board of Trustee's
13 Westside Drive, Suite 92
North Grosvenordale, CT 06255

Kenneth C. Baldwin